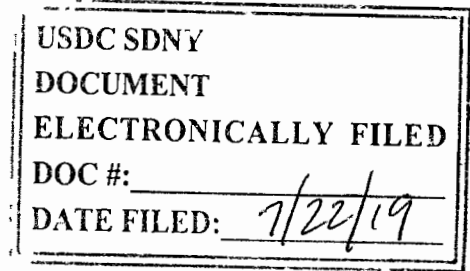


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July 22, 2019

VIA ECF

Hon. Naomi Reice Buchwald
U.S. District Judge
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

RE: ILYA MELNICHENKO, OLGA MILINTENKOVA, and EVGENY TARASOV,
Plaintiffs, vs. MR. MART, USA, LLC ET AL.
(S.D.N.Y. Case No. 1:17-cv-04021-NRB)

Your Honor:

As the court is aware, I represent the corporate Defendants/Third Party Plaintiffs in the above-styled cause (the only Defendant entities I do not represent are Mona Shah, P.C. and Sirota & Associates, P.C.). On behalf of those parties, and the Plaintiffs in the main action, I am requesting a very short joint extension of time, up to and including Monday, July 22, 2019, to exchange responses to our respective discovery requests. I initiated the request due to the fact that said discovery was due to be served today, as per the Court's Order announced at the June 12th Case Management Conference; unfortunately, my wife and I had to have our 15-year old rescue dog put down earlier today as he was in end-stage cancer. Plaintiff's counsel was very courteous and agreed to my request with the understanding that we exchange our respective discovery responses to the other on Monday instead of today (I also want to make the Court aware that several thousand pages of documents were timely exchanged by me with counsel for the Sirota Third Party Defendants, and over 300 pages of bank records have already been produced to Plaintiffs as well). There have not been any prior requests by my clients for an extension of time to for this purpose. Finally, as an officer of the Court, I can also represent that this request is made in good faith (for the reason stated above) and not for dilatory purposes.

*Appropriate
notice
Rece
Buchwald
USDC
7/22/19*

VIA ECF

Hon. Naomi Reice Buchwald
U.S. District Judge

RE: **ILYA MELNICHENKO, OLGA MILINTENKOVA, and EVGENY TARASOV,**
Plaintiffs, vs. MR. MART, USA, LLC ET AL.
(S.D.N.Y. Case No. 1:17-cv-04021-NRB)

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I thank Your Honor in advance for your time and consideration of this request.

Very truly yours,

s/Andrew M. Kassier, Esq.

ANDREW M. KASSIER, ESQ.
(State of Florida Bar No. 316547)

AMK/hs

cc: All counsel of record